Module 10: EMS Documentation

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GUIDANCE

Documentation is manifested in the EMS Manual and other documents that are used to develop the EMS Manual. Documentation is important to the success of your EMS for several reasons:

- **Consistency.** Word-of-mouth information is rarely communicated consistently, whereas written information is more likely to be constant from person to person and over time. Documentation is vital to maintaining consistency in an EMS over time and from department to department. In most companies, change is a fact of life; new projects are undertaken, the company grows, and employees change positions or leave the company. Accurate documentation will make it much easier to maintain an effective and flexible EMS during these changes.
- **Assessment of Progress.** Creating documentation helps you assess the progress of your EMS. Some inconsistencies show up only as you commit your ideas to paper and having a record allows you to check on progress and evaluate results.
- **Demonstration.** If you want to certify your EMS (for example, to the ISO 14001 standard) or enter a recognition program such as those under EPA's Performance Track, you must demonstrate that your EMS is complete and functioning. In this case, your EMS documentation may be audited or reviewed.

The EMS Manual

An EMS manual is a series of explanations of the processes your organization implements to conform to the EMS criteria (such as the elements discussed in this Guide). While you don't need to maintain a single "manual" that contains all of your EMS documentation, you should maintain a summary of the EMS that:

- describes the system's core elements (and how the elements relate to each other), and
- provides direction to related documentation.

Other EMS Documentation

In addition to the EMS manual, your organization should maintain other documentation of its EMS. You should document the processes used to meet the EMS criteria. (For example, "How do we identify environmental aspects?" "How do we implement corrective actions?") This documentation generally takes the form of system **procedures**. In addition, you might maintain area-or activity-specific documentation (such as work instructions) that direct employees on how to carry out certain operations or activities.

EMS **documentation** is related to (but not the same as) EMS **records**.

- ✓ EMS **documentation describes** what your system consists of (i.e., what you do and how you do it), while
- ✓ EMS **records demonstrate** that you are doing what the documentation said you would do. Records management is discussed later in this Guide (see *Module 16*).

Tip

*Keep EMS documentation **simple**. Your manual does **not** need to describe every detail of your EMS. Instead, the manual can **provide references** to other documents or procedures. EMS documentation should be updated as needed, based on any system improvements you put in place. However, if you put too much detail in an EMS manual, you might need to update the manual frequently.*

What Constitutes EMS Documentation?
Consider the following:

- your environmental policy
- your organizational chart or lists/tables of key responsibilities
- a description or summary of **how** your organization satisfies EMS requirements (e.g., "How do we identify environmental aspects?" "How do we identify and comply with legal requirements?" "How do we control documents?")
- system-level procedures (for example, procedure for corrective and preventive action)
- activity- or process-specific operational control procedures/work instructions
- other EMS-related documents (such as emergency preparedness and response plans, training plans, etc.)

How to Develop Your Documentation

Step 1: Determine how EMS documentation can be integrated into existing documents.

Before you dive into your documentation, learn how deep the water is. Find out what documentation already exists, what its purpose is, and whether it works. The goal of this search is to locate materials you can use to begin your EMS implementation and documentation. Many facilities use the same format for all of their documents. An example of existing documentation might be a quality plan or tracking report. See **Tool 10-1** through **Tool 10-4** will assist you in developing EMS documentation while following these steps.

Step 2: Tailor the documentation to your organization's needs.

You will probably have to compromise in producing documentation that meets your needs while also meeting your budget. Here are some questions to help you determine what fits your needs:

- How can we use or revise existing documents rather than creating new ones?
- Does our business operate in a single location or many? This will affect who creates some of the documents and where they are located. It may also affect how many versions of a document might be necessary to cover different circumstances.
- What is our current computer capability? Many companies use an electronic system to maintain documents.
- What security precautions do we need? While computer systems are handy, they often can be accessed by a number of people. Electronic documentation can be edited or destroyed. Security, or at least restrictions on who can change data, can be a critical issue for many companies that use electronic documentation systems.

Step 3: Determine a standard format for all documents.

Before developing your EMS documents, plan the format (document and page appearance) for the documents. If a company standard exists, use it. If not, the need for EMS documentation provides an opportunity to create a standard company format. Consider whether pages are single- or double-sided and why; choose margins, header, footer, typefaces, text, headings, etc. Include plans for bulleted and numbered lists, tables, and even paragraph spacing. Once you have a consistent format for documents, anyone who writes one will use the established format and fill in the necessary text. All documents will look like part of an organized, integrated system. Most importantly, documents will be easier to read and understand!

L Tip

*Not all documentation needs to be text. Some shops use signs above the appropriate equipment for some work instructions (like a no dumping sign above a storm drain). Sometimes, bilingual text may be needed. Consider the needs of the user**; if its not understood, it won't be implemented.***

Step 4: Prototype each document.

Prototyping means visualizing what you will need in the document and creating an outline for it before you actually have information to fill in. This is like drafting a document, but in an outline fashion. As you consider what is needed for the document, you also gain understanding about what you may need to support the EMS. It's a way of "outlining" your EMS as well as designing documents.

The best people to prototype or provide early input to documents, are the people who will use the document. Involving them in the process should help make sure the documents are usable and applied to support the EMS.

The following questions will help you plan your documents. Consider these questions for each document you identify as necessary for your company:

- What is the document's purpose?
- Who will use it and how will they use it?
- How long should the document be?
- What must be included in the document? Which information is most critical?
- Is it process-focused? Process focus rather than regulation- or program-focus helps people who use the documents to better understand how their jobs fit into the rest of the company functions.
- How is the information best arranged? Will the user read sequentially or randomly?

TOOLS

This section provides tools to develop EMS documentation.

Tool 10-1: EMS Documentation Worksheet

Do we have **existing documentation of our EMS**? If yes, how is this EMS documentation **maintained?** (electronically? In paper form?)	
Who is responsible for maintaining EMS documentation within our organization?	
Do we have an **EMS manual** or other summary document that describes the key elements of the EMS? If so, does this document describe the **linkages** among system elements?	
What does our EMS documentation consist of? (List components such as environmental policy, EMS manual, activity-level procedures or work instructions, emergency plans, etc.)	
Is our EMS documentation **integrated with other organizational documentation** (such as human resource plans or quality procedures)? If so, how do we ensure proper **coordination** between environmental and these other functions?	
How will we keep our EMS documentation **up-to-date**?	
Our next step on EMS documentation is to …	

Tool 10-2: Sample Worksheet for Development of EMS Documentation

Documents	Determine Format: Who/ Date Completed	Develop Prototype/ Draft: Who/ Date Completed	Assign Writing: Who/ Date	Review Writing/ Compare to Prototype/Draft: Who/ Date	Added to Document List/ Date	Who Has Access	Where Located
Existing Documents							
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
Documents to be Created							
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
Contact Person:		Date Completed:					

Tool 10-3: Sample Outline for EMS Manual and Other EMS Documents

Basic EMS Manual

- **Index/Revision History/Distribution List**
- **Environmental Policy**
- **Description of How Our EMS Addresses Each of the EMS Elements (and linkages among these elements)**
  - How We Identify Significant Environmental Aspects and Determine Significance
  - How We Identify, Access and Analyze Legal and Other Requirements
  - How We Establish and Maintain Objectives and Targets
  - How the Organizational Structure Supports EMS (organization charts, key responsibilities)
  - How We Train our Employees and Ensure Competence
  - How We Communicate (internally and externally)
  - How We Prepare, Revise, and Control EMS Documents
  - How We Identify Key Processes and Develop Operational Controls for Them
  - How We Prepare for and Respond to Emergencies
  - How We Measure and Monitor Key Characteristics of Operations and Activities
  - How We Identify, Investigate and Correct Nonconformance
  - etc.

Environmental Management Program(s) Description

- **Annual Objectives and Targets**
- **EMP(s) (to achieve objectives and targets)**
- **Tracking and Measuring Progress**

EMS Procedures

- **Index/Revision History/Distribution List**
- **Organization-wide Procedures (for some EMS elements there might be more than one procedure)**
  - Identification and Access to Legal and Other Requirements
  - Identification of Environmental Aspects and Determination of Significant Environmental Aspects
  - Identification of Objectives and Targets
  - Environmental Review for New Purchases, Processes, and Products
  - Training, Awareness and Competence
  - Communication (internal and external)
  - EMS Documentation and Control
  - Management of Suppliers / Vendors
  - Operational Control Development
  - Emergency Preparedness and Response
  - Compliance Assessment
  - Corrective and Preventive Action
  - Records Management
  - EMS Auditing
  - Management Review
- **Procedures/Work Instructions for Specific Operations or Activities**
  - Waste Management
  - Wastewater Treatment *(These are examples only)*
  - Operation of Abrasive Blasting Equipment

Other EMS Documentation

- **Emergency response plans, etc.**

Tool 10-4: Sample Procedure for EMS Documentation

Purpose

To ensure effective operation of the EMS, [Your Facility's Name] documents the procedures of its EMS and keeps records of the outcomes of EMS processes and of the important environmental issues facing the plant. This EMS manual comprises this documentation.

Procedure

1. The Environmental Management Representative (EMR) documents the procedures that define [Your Facility's Name] EMS in this EMS manual.
2. The Cross Functional Team (CFT) formally reviews and, if necessary, revises this manual on an annual basis.
3. Revised manuals are assigned a new revision number (a minor set of revisions would change the number from, say, 1.1 to 1.2; a major revision would change the number from, say, 1.1 to 2.0). Finally, the EMS Coordinator ensures that no employees or managers use outdated revisions of this manual.

Frequency

This EMS Manual will be reviewed and revised on an annual basis.

Records

The EMS Manual will be maintained as described above.